

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

ALEXANDER BRICKHOUSE)	
)	
	Plaintiff,)
v.)	Case No. 3:12-cv-00593-DRH-PMF
)	
JOHN REDSTONE)	
)	
	Defendant.)
)	

DEFENDANT’S MOTION TO CHANGE VENUE

NOW COMES Plaintiff, ALEXANDER BRICKHOUSE, by and through his attorney, Haytham Faraj, and respectfully requests a change of venue from the Benton courthouse to the East St. Louis Courthouse.

The trial on this matter is set to take place in the Benton Courthouse. Plaintiff requests the trial be moved, within the Southern District of Illinois, from Benton to the East St. Louis Courthouse, for judicial economy, costs and convenience of all parties and witnesses involved.

Witnesses on both sides of the controversy, including the Granite City police officers, reside in or near Granite City, Illinois, which is approximately seven (7) miles from the East St. Louis courthouse. The Benton division, on the other hand, is over one hundred (100) miles from the residence of all witnesses. Holding the trial in the East St. Louis courthouse will mitigate the costs associated with travel and attorney’s fees and will ensure the presence of all witnesses at trial. This change in venue will not prejudice any party and will, instead, enhance judicial economy because it decreases the likelihood that witnesses will be delayed and increases the convenience and efficiency for both sides. Plaintiff’s counsel has already consulted with Defense counsel who takes no position on the matter.

Accordingly, Plaintiff respectfully requests that this Honorable Court grant Plaintiff's motion to change venue from the Benton Courthouse to the East St. Louis Courthouse within the Southern District of Illinois, for good cause as set forth herein.

Respectfully submitted,

/s/ Haytham Faraj
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CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2014, I electronically filed the forgoing paper with the Clerk of Court using the ECF system which will send notice of the filing to all attorney's of record and the Court.

Dated: October 22, 2014

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